

26 March 2025

ATO Class Rulings

Scheme Class Ruling

Pilbara Minerals Limited (ASX:PLS) (**PLS** or the **Group**) advises that the Australian Taxation Office (**ATO**) has published a Class Ruling (CR 2025/24) (the **Scheme Ruling**) relating to the Australian income tax implications for certain Latin Resources Limited (**Latin Resources**) shareholders (**Latin Resources Shareholders**) and for certain Latin Resources optionholders (**Latin Resources Optionholders**) in relation to their disposal of Latin Resources shares and Latin Resources options respectively through the schemes of arrangement (**Schemes**) which were implemented on 4 February 2025.

The Scheme Ruling confirms the availability of scrip for scrip capital gains tax roll-over relief for certain Latin Resources Shareholders. The Scheme Ruling also confirms that scrip for scrip capital gains tax roll-over relief is not available for Latin Resources Optionholders.

The Scheme Ruling can be viewed or downloaded from the ATO website via the following link: <https://ato.gov.au/law/view/document?DocID=CLR/CR202524/NAT/ATO/00001&PiT=99991231235958>.

Demerger Class Ruling

PLS advises that the ATO has also published a Class Ruling (CR 2025/23) (the **Demerger Ruling**) relating to the Australian income tax implications for certain Latin Resources Shareholders who received a return of capital by way of an in specie distribution of shares in ESG Minerals Limited (**Demerger**) which was implemented on 30 January 2025.

The Demerger Ruling confirms that demerger roll-over relief is not available for the Demerger. The Demerger Ruling also confirms that no part of the value of the ESG Minerals Limited shares transferred to certain Latin Resources Shareholders constituted a dividend.

The Demerger Ruling can be viewed or downloaded from the ATO website via the following link: <https://ato.gov.au/law/view/document?DocID=CLR/CR202523/NAT/ATO/00001&PiT=99991231235958>

The information contained in this announcement is summary in nature and Latin Resources Shareholders and Latin Resources Optionholders should refer to the Scheme Ruling and Demerger Ruling for a better understanding of their contents. The tax consequences of the Schemes and Demerger may vary depending upon the individual circumstances of Latin Resources Shareholders and Latin Resources Optionholders. Latin Resources Shareholders and Latin Resources Optionholders should consult their own tax advisers as to the potential tax consequence for them.

Release authorised by Dale Henderson, PLS's Managing Director and CEO.

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PLS is a leading global producer of lithium materials, with a diversified portfolio of assets and strategic partnerships in the rapidly growing battery materials sector. The Group owns 100% of the world's largest, independent hard-rock lithium operation, the Pilgangoora Operation in Australia, and the Colina Lithium Project in Brazil. PLS is also integrated into the lithium value chain through its joint venture with POSCO in South Korea, which manufactures battery-grade lithium hydroxide.

With significant scale, high-quality assets, and a strong commitment to advancing the global energy transition, PLS has established enduring partnerships with leading international companies in the sector such as POSCO, Ganfeng, Chengxin, Yahua, and General Lithium.

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